

SHER TREMONTE LLP

November 2, 2018

BY ECF

Hon. Lewis A. Kaplan
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Andreea Dumitru*
(Case No. 18-CR-00243)

Dear Judge Kaplan:

We write, on behalf of Defendant Andreea Dumitru, to respond to the Government's letter motion concerning references to the current public discourse on immigration policy, recent developments or policy changes with respect to immigration, or any political events related to immigration policy or reform.

The Government's motion is premature. As of this date, the topics Defendant intends to cover on cross-examination is unsettled and highly dependent on the direct examinations of the Government's witnesses and other evidence presented during the course of the Government's case-in-chief. Whether examination on the topics described above is relevant or appropriate cannot be established before hearing the Government witnesses' testimony on direct examination. We can, however, represent to the Court that we will not affirmatively refer to any of the topics described above during the Defendant's opening statement.

In light of the foregoing, the Court need not address this issue unless and until it becomes necessary during trial.

Respectfully submitted,

/s/ Justin M. Sher

Justin M. Sher
Allegra A. Noonan

cc: All counsel of record